

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SERGIO BONILLA, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC., a Delaware
Corporation,

Defendant.

Case Nos: 1:21-cv-00051
 1:21-cv-00610

JURY TRIAL DEMANDED

THERESA LOENDORF, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC., a Delaware
Corporation;

Defendant.

**JOINT MOTION FOR EXTENSION OF TIME TO FILE
AND LEAVE TO FILE EXCESS PAGES**

Pursuant to Local Rules 7.1 and 78.3, Plaintiffs Bonilla and Loendorf, and Defendant PeopleConnect, Inc., by and through their undersigned attorneys, respectfully request the following briefing schedule with respect to Defendant's pending Motion to Dismiss Plaintiffs' Consolidated Class Action Complaint ("Motion to Dismiss"): (a) Plaintiffs' opposition brief to be filed by Monday, June 7; and (b) Defendant's reply brief to be filed by Monday, June 21. In addition, Plaintiffs respectfully request leave to file their opposition in excess of fifteen pages. Specifically, Plaintiffs request leave to file at a maximum of thirty-five pages, the same page

limit the Court granted to Defendant with respect to its brief in support of its Motion to Dismiss. ECF No. 43. In support of this motion, Plaintiffs state as follows:

1. Defendant PeopleConnect Inc. filed a Motion to Dismiss and memorandum in support on May 10. ECF Nos. 44 and 45. Defendant's memorandum in support is thirty-five pages long. ECF No. 45.

2. Plaintiffs' request a June 7 deadline to file their opposition. Plaintiffs' request for a total of four weeks to prepare their opposition is driven by: (a) the length of Defendant's memorandum and the number and complexity of issues raised therein; (b) counsels' pre-existing commitments on other matters; and (c) one of the attorneys responsible for drafting the opposition will be on vacation for part of this time.

3. Plaintiffs request leave to file a brief of no more than thirty-five pages, matching the length of Defendant's memorandum. Plaintiffs believe these pages are required to fully address the issues raised in Defendant's memorandum.

4. Plaintiffs have conferred with opposing counsel, who have no objection to Plaintiffs' proposed June 7 filing date and request for additional pages. Defendant's counsel requested that they have until June 21 to file their reply. Plaintiffs' counsel have no objection to that schedule.

Accordingly, Plaintiffs and Defendant respectfully request that the Court grant this motion and enter an order granting the proposed briefing schedule and granting Plaintiffs leave to file an opposition not to exceed thirty-five pages.

Respectfully submitted,

Dated: May 17, 2021

By: /s/ Shannon M. McNulty

Shannon M. McNulty
CLIFFORD LAW OFFICES, P.C.
120 N. LaSalle Street, 31st Floor
Chicago, Illinois 60602
312.899.9090
312.251.1160 Facsimile
SMM@cliffordlaw.com

Michael F. Ram (to be admitted *Pro Hac*)
mram@forthepeople.com
Marie N. Appel (to be admitted *Pro Hac*)
mappel@forthepeople.com
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
711 Van Ness Avenue, Suite 500
San Francisco, CA 94102
Telephone: (415) 358-6913
Facsimile: (415) 358-6923

Benjamin R. Osborn (to be admitted *Pro Hac*)
102 Bergen St.
Brooklyn, NY 11201
Telephone: (347) 645-0464
ben@benosbornlaw.com

*Attorneys for Plaintiff Bonilla
and the Proposed Class*

NICK LARRY LAW LLC

By: /s/ J. Dominick Larry
J. Dominick Larry

J. Dominick Larry
55 E Monroe Street, Suite 3800
Chicago, IL 60603
Tel: (773) 694-4669
Fax: (773) 694-4691
E-Mail: nick@nicklarry.law

PEOPLECONNECT, INC

By: /s/ Wade A. Thomson

Wade A. Thomson, #6282174
Debbie L. Berman, #6205154
Clifford W. Berlow, #6292383
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654-3456
Telephone: 312 222-9350
Facsimile: 312 527-0484
wthomson@jenner.com
dberman@jenner.com
cberlow@jenner.com

Ian Heath Gershengorn (pro hac vice)
JENNER & BLOCK LLP
1099 New York Avenue, NW, Suite 900
Washington, DC 20001-4412
Telephone: 202 639-6000
Facsimile: 202 639-6066
igershengorn@jenner.com

Attorneys for Defendant PeopleConnect, Inc.

BURSOR & FISHER, P.A.
Philip L. Fraietta (Pro Hac Vice Forthcoming)
888 Seventh Avenue
New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
E-Mail: pfraietta@bursor.com

Attorneys for Plaintiff Loendorf